



David J. Larson, Esq.
dlarson@wwhgd.com
Nevada Bar No. 8837
Ryan T. Gormley, Esq.
rgormley@wwhgd.com
Nevada Bar No. 13494
WEINBERG, WHEELER, HUDGINS,
GUNN & DIAL, LLC
6385 South Rainbow Blvd., Suite 400
Las Vegas, Nevada 89118
Telephone: (702) 938-3838

*Local Counsel for Plaintiff,
Ernest Bock L.L.C.*

John F. Palladino, Esq.
john@hankinsandman.com
Admitted Pro Hac Vice
Evan M. Labov, Esq.
evanl@hankinsandman.com
Admitted Pro Hac Vice
HANKIN SANDMAN PALLADINO
WEINTROB & BELL, P.C.
30 South New York Avenue
Atlantic City, NJ 08401
Telephone: (609) 344-5161

*Pro Hac Counsel for Plaintiff,
Ernest Bock L.L.C.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ERNEST BOCK, L.L.C.,

Plaintiff,

vs.

PAUL STEELMAN, individually, PAUL STEELMAN, as
trustee of the Steelman Asset Protection Trust, MARYANN
STEELMAN, individually, MARYANN STEELMAN, as
trustee of the Steelman Asset Protection Trust, STEPHEN
STEELMAN, SUZANNE STEELMAN TAYLOR,
JOHN DOE 1, as trustee of Paul C. Steelman and Maryann
T. Steelman Revocable Living Trust, JOHN DOE 2, as
trustee of Stephen P. Steelman Irrevocable Trust, JOHN
DOE 3, as trustee of Suzanne T. Steelman Irrevocable Trust,
JOHN DOE 4, as trustee of the Steelman Asset Protection
Trust, JOHN DOES 5-14, as trustees of ABC trusts 1-10,
JOHN DOES 15-24, and ABC COMPANIES 1-10, jointly,
severally, and in the alternative,

Defendants.

Case No.: 2:19-cv-01065-JAD-
EJY

**JOINT STIPULATION TO
EXTEND THE TIME FOR
PLAINTIFF TO FILE AN
OPPOSITION TO
DEFENDANTS' MOTION
FOR A PROTECTIVE
ORDER**

(First Request)

Plaintiff Ernest Bock, L.L.C. ("Bock") and Defendants Paul Steelman, Maryann Steelman, Steelman Asset Protection Trust, Stephen Steelman, Suzanne Steelman Taylor, and Trustee of Paul C. Steelman and Maryann T. Steelman Revocable Living Trust's (collectively, "Defendants" or "Stelman Parties"), by and through their respective counsel, hereby submit this Joint Stipulation (the "Stipulation") to Extend the Time for Plaintiff to File an Opposition (the

“Opposition”) to Defendants’ Motion for a Protective Order (ECF No. 90) (the “Motion”). The Motion was filed on December 22, 2020.

Under LR 7-2(b), the Opposition is currently due on Tuesday, January 5, 2021. Because existing work obligations and holiday closures will render it challenging for Bock to comply with the current filing deadline, the parties hereby stipulate to extend the time for Bock to file the Opposition to **Tuesday, January 12, 2021**.

This is the first stipulation for an extension of time to file the Opposition. The Stipulation is made in good faith and not for purposes of delay.

DATED: December 26, 2020.

DATED: December 26, 2020

**WEINBERG, WHEELER, HUDGINS,
GUNN & DIAL, LLC**

**BROWNSTEIN HYATT FARBER
SCHRECK, LLP**

BY: Evan M. Labov

DAVID J. LARSON, ESQ., #8837
dlarson@wwhgd.com
RYAN T. GORMLEY, Esq., #13494
rgormley@wwhgd.com
6385 South Rainbow Blvd., Suite 400
Las Vegas, NV 89118

BY: Emily A. Ellis

FRANK M. FLANSBURG III, ESQ., #6974
fflansburg@bhfs.com
EMILY A. ELLIS, ESQ., #11956
eellis@bhfs.com
Emily L. Dyer, Esq.
edyer@bhfs.com
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614

Local Counsel for Plaintiff

HANKIN, SANDMAN, PALLADINO, WEINTROB & BELL, P.C. *Attorneys for Defendants*

JOHN F. PALLADINO, ESQ. (*pro hac vice*)
john@hankinsandman.com
EVAN M. LABOV, ESQ. (*pro hac vice*)
evanl@hankinsandman.com
30 South New York Avenue
Atlantic City, NJ 08401

Pro-Hac Counsel for Plaintiff

ORDER

IT IS SO ORDERED on this 28th day of December, 2020.


UNITED STATES MAGISTRATE JUDGE

